

September 12, 1997

Office of the General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Sep 15 6 29 AM '97

Re MUR 3774, Letter dated August 21, 1997

REQUESTS FOR PRODUCTION OF DOCUMENTS

Documents are enclosed.

REQUEST FOR ANSWERS TO QUESTIONS

Please see answers below:

1 - Identify all current and former officers, employees and consultants of Optima Direct, Inc., with knowledge of work performed, or services rendered, by Optima Direct, Inc. for Minnesota Citizens Concerned for Life, Inc., Minnesota Citizens Concerned for Life Committee for a Pro-Life Congress, the National Right to Life Committee, the Rod Grams for U.S. Senate and Abraham for Senate between October 1, 1994 and December 31, 1994.

The current and former officers, employees and consultants are:

Shannon MacNutt, Business: 8100 Boone Boulevard, Vienna, VA 22182, 703 918-9000; Residence: [REDACTED]
[REDACTED] Former employee.

Matt Sottong, Business: 8100 Boone Boulevard, Vienna, VA 22182, 703 918-9000; Residence: [REDACTED]
[REDACTED] Former employee.

Michelle Sottong, Business: 8100 Boone Boulevard, Vienna, VA 22182, 703 918-9000; Residence: [REDACTED]
[REDACTED] Current employee. Director of Inbound Services.

Phyllis Marsh, Business: 8100 Boone Boulevard, Vienna, VA 22182, 703 918-9000; Residence: [REDACTED]
[REDACTED] Former employee.

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Andrew Baum, Business: 8100 Boone Boulevard, Vienna, VA 22182, 703
918-9000; Residence: [REDACTED]
[REDACTED] Current employee. Vice President.

Linda Bailie, Business: 8100 Boone Boulevard, Vienna, VA 22182, 703
918-9000; Residence: [REDACTED]
[REDACTED] Current employee. Senior Vice President.

Glenn Lebowitz, Business: 8100 Boone Boulevard, Vienna, VA 22182,
703 918-9000; Residence: [REDACTED]
[REDACTED] Current employee. President.

Kevin Potter, Business: 8100 Boone Boulevard, Vienna, VA 22182, 703
918-9000; Residence: [REDACTED]
[REDACTED] Current employee. Executive Vice President.

Tim Grady, Business: 8100 Boone Boulevard, Vienna, VA 22182, 703
918-9000; Residence: [REDACTED]
[REDACTED] Former employee.

Chris Morse, Business: 8100 Boone Boulevard, Vienna, VA 22182, 703
918-9000; Residence: [REDACTED]
[REDACTED] Former employee.

Margaret Gregory, Business: 8100 Boone Boulevard, Vienna, VA 22182,
703 918-9000; Residence: [REDACTED]
[REDACTED] Former consultant.

Cindy Martin, Business: 8100 Boone Boulevard, Vienna, VA 22182, 703
918-9000; Residence: [REDACTED]
[REDACTED] Former employee.

Rich Tellez, Business: 8100 Boone Boulevard, Vienna, VA 22182, 703
918-9000; Residence: [REDACTED]
[REDACTED] Current employee. Network Administrator.

Mark L'Italien, Business: Business: 8100 Boone Boulevard, Vienna, VA
22182, 703 918-9000; Residence: [REDACTED]
[REDACTED] Current Employee. Director of Information
Systems.

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2 - Identify all current and former officers and employees of Optima Direct, Inc., with knowledge of telemarketing programs conducted by Southern Education Counsel, Inc. (also known as Southern Education Council) (hereinafter "SEC, Inc.") and/or the Civic Development Group, Inc., as subcontractor(s) for Optima Direct, between October 1, 1994 and December 31, 1994, in which U.S. Senate elections or candidates were mentioned

The current and former officers and employees are:

Shannon MacNutt, Business: 8100 Boone Boulevard, Vienna, VA 22182, 703 918-9000; Residence: [REDACTED]
[REDACTED] Former employee.

Matt Sottong, Business: 8100 Boone Boulevard, Vienna, VA 22182, 703 918-9000; Residence: [REDACTED]
[REDACTED] Former employee.

Michelle Sottong, Business: 8100 Boone Boulevard, Vienna, VA 22182, 703 918-9000; Residence: [REDACTED]
[REDACTED] Current employee. Director of Inbound Services.

Phyllis Marsh, Business: 8100 Boone Boulevard, Vienna, VA 22182, 703 918-9000; Residence: [REDACTED]
[REDACTED] Former employee.

Andrew Baum, Business: 8100 Boone Boulevard, Vienna, VA 22182, 703 918-9000; Residence: [REDACTED]
[REDACTED] Current employee. Vice President.

Linda Bailie, Business: 8100 Boone Boulevard, Vienna, VA 22182, 703 918-9000; Residence: [REDACTED]
[REDACTED] Current employee. Senior Vice President.

Glenn Lebowitz, Business: 8100 Boone Boulevard, Vienna, VA 22182, 703 918-9000; Residence: [REDACTED]
[REDACTED] Current employee. President.

Kevin Potter, Business: 8100 Boone Boulevard, Vienna, VA 22182, 703 918-9000; Residence: [REDACTED]
[REDACTED] Current employee. Executive Vice President.

Tim Grady, Business: 8100 Boone Boulevard, Vienna, VA 22182, 703 918-9000; Residence: [REDACTED]
[REDACTED] Former employee.

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Chris Morse, Business: 8100 Boone Boulevard, Vienna, VA 22182, 703 918-9000; Residence: [REDACTED]
[REDACTED] Former employee.

Cindy Martin, Business: 8100 Boone Boulevard, Vienna, VA 22182, 703 918-9000; Residence: [REDACTED]
[REDACTED] Former employee.

Rich Tellez, Business: 8100 Boone Boulevard, Vienna, VA 22182, 703 918-9000; Residence: [REDACTED]
[REDACTED] Current employee. Network Administrator.

Mark L'Italien, Business: Business: 8100 Boone Boulevard, Vienna, VA 22182, 703 918-9000; Residence: [REDACTED]
[REDACTED] Current Employee. Director of Information Systems.

3 - State the date on which Optima Direct, Inc. contracted, or otherwise entered into a arrangement with, SEC, Inc., and/or Civic Development Group, Inc., to conduct telemarketing program(s) that referenced 1994 U.S. Senate elections or candidates.

November 4, 1994, with Civic Development Group, Inc.

4 - Identify the client(s) of Optima Direct, Inc. on whose behalf Optima Direct entered into a subcontract(s) with the SEC, Inc., and/or Civic Development Group, Inc. to conduct telemarketing program(s) that referenced 1994 U.S. Senate elections or candidates.

The clients are: Minnesota Citizens Concerned for Life, Inc., National Right to Life Committee, Abraham for Senate, Rod Grams for U.S. Senate Committee

5 - Identify all entities or persons who paid for telemarketing program(s) conducted by SEC, Inc., and/or Civic Development Group, Inc. on behalf of Optima Direct, Inc. and its clients between October 1, 1994 and December 31, 1994 in which 1994 U.S. Senate elections or candidates were mentioned.

The entities or persons are: Minnesota Citizens Concerned for Life, Inc., National Right to Life Committee, Abraham for Senate, Marina Taubenberger (Rod Grams for Senate).

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6 - Identify all federal candidates mentioned in telemarketing programs conducted by the SEC, Inc., and/or Civic Development Group on behalf of Optima Direct, Inc. and its clients between October 1, 1994 and December 31, 1994.

The candidates are:

Jan Stoney, Bob Kerrey, Jon Christensen, Peter Hoagland, Oliver North, Chuck Robb, Marshall Coleman, Jim Chapman, Owen Pickett, George Sweet, Norman Sisisky, George Landrith, L.F. Payne, Kyle McSarrow, Jim Moran, Steve Fast, Rick Boucher, David Funderbunk, Richard Moore, Walter Jones, Martin Lancaster, Richard Burr, Sandy Sands, Sue Myrick, Rory Blake, Charles Taylor, Maggie Lauterer, Bill Frist, Fred Thompson, Jim Sasser, Jim Cooper, Steve Largent, Stuart Price, J.C. Watts, David Perryman, Zach Wamp, Randy Button, Van Hilleary, Jeff Whorley, Ed Bryant, Harold Byrd, Jim Inhofe, David McCurdy, Jack Mildren, Joe Scarborough, Vince Whibbs, Don Garlits, Karen Thurman, Charles Canady, Robert Connors, Dave Weldon, Sue Munsey, Mac Collins, Fred Overby, John Linder, Comer Yates, Newt Gingrich, Ben Jones, Bob Barr, Buddy Darden, Charles Norwood, Don Johnson, Larry Bigham, John Spratt, Donna Peterson, Charles Wilson, Pete Sessions, John Bryant, Steve Stockman, Jack Brooks, Henry Bonilla, Rolando Rios, Ed Harrison, Martin Frost, Gene Fontenot, Ken Bentsen.
Rod Grams, Gil Gutknecht, John Hottinger, Ann Wynn.
Spencer Abraham

7 - Identify the owner(s) of all lists used by Optima Direct, Inc. or by any subcontractor of Optima Direct, Inc., in telemarketing programs conducted between October 1, 1994 and December 31, 1994, on behalf of:

- a. Minnesota Citizens Concerned for Life, Inc.
Lists provided by Minnesota Citizens Concerned for Life, Inc.
- b. Minnesota Citizens Concerned for Life Committee for a Pro-life Congress
Lists provided by Minnesota Citizens Concerned for Life, Inc.
- c. National Right to Life Committee
Lists provided by National Right to Life Committee.
- d. Rod Grams for U.S. Senate Committee
Lists provided by Rod Grams for U.S. Senate Committee
- e. Abraham for Senate
Lists provided by Abraham for Senate

8 - For each question and subpart above, identify the person(s) who has the most knowledge with respect to your answer:

Andrew Baum. Business: 8100 Boone Boulevard, Vienna, VA 22182, 703 918-9000; Residence: [REDACTED]

[REDACTED] Current employee. Vice President.


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I hereby certify under penalty of perjury that the foregoing answers to the request for answers to questions are true and correct to the best of my knowledge, information and belief.



Andrew Baum
Vice President

SUBSCRIBED and SWORN before me this 12th day of September, 1997.


Notary Public

My commission expires February 25, 1998

2004.09.25 14:00

LETTER OF AGREEMENT

November 2, 1994

This Agreement, when signed by authorized representatives of each of our organizations, constitutes the Agreement between the MINNESOTA CITIZENS CONCERNED FOR LIFE (MCCL) and OPTIMA DIRECT, INC. ("ODI") for outbound telemarketing and attendant support services that ODI will provide for MCCL.

ODI will invoice MCCL for one half of estimated charges before calling has commenced. ODI will base this invoice on an industry standard file penetration of 70% or specific goals established in advance by MCCL. Payment must be received before ODI can begin telemarketing activity. The remainder of the payment is due upon completion of work.

Any unused portion of MCCL's payment will be refunded to MCCL within one week of the completion of the program.

Beginning on a date to be determined by MCCL, ODI will conduct a get-out-the vote telemarketing program to pre-selected names on the file.

Optima
DIRECT, INC

For the services described in the Agreement, MCCL agrees to pay ODI the following fees:

Phone contact: \$.48 per contact*

Data processing: \$90.00 per hour

Delivery: AT COST

* This price is contingent upon receipt of a final script. This script must run 20 seconds or less in time, or the price is subject to change. A contact is defined as a presentation of the script, whether complete or incomplete, to any adult answering the phone, or an answering machine.

FOR OPTIMA DIRECT, INC.:

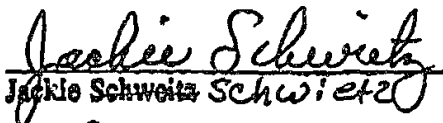


Kevin Potter
Executive Vice President

11/3/94

Date

FOR MCCL:



Jackie Schweitz

Title Co-Executive Director

11-3-94

Date

NL201
GRAND
JURY

McCL

#6154

WLC

NL-200 = 38,819.60
NL20 = 11,80.46

NL200 = 11,80.46
NL201 = 38,819.60

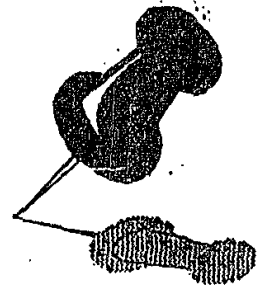
26812451

201

NATIONAL RIGHT TO LIFE COMMITTEE, INC.		SIGNET BANK NA WASHINGTON, DC	
419 7TH ST., N.W., SUITE 500 WASHINGTON, DC 20004		15-80/540	
PAY	<i>Eighty thousand dollars and 00/100</i>	DATE	<i>11-3-94</i>
TO THE ORDER OF	<i>Optima Direct</i>	AMOUNT	<i>\$50,000.00</i>
NL200/201		TWO SIGNATURES REQUIRED IF OVER \$3,000.00.	
		AUTHORIZED SIGNATURE	

006343 054000807 667004200B

006343 054000807 667004200B



FAX COVER PAGE

To: <i>Dave Keenan</i>	From: <i>Matt Sotthoff / Jennifer Kelly</i>	
Company:	Company: Optima Direct, Inc.	
Fax Number:	Total Pages Including Cover:	
Date:	Time:	For Information Call: 202-842-2400
Subject:	Fax Number: 202-842-0992	

This facsimile contains PRIVILEGED & CONFIDENTIAL information, intended only for the use of the addressee(s). If you are not the intended recipient, you are hereby notified that any dissemination or copying of this facsimile is strictly prohibited. If you have received this facsimile in error, please notify us by phone immediately and return the original facsimile to us at 1000 Vermont Avenue, NW, Washington, DC, 20005.

2004-04-29 10:00

Optima

DIRECT, INC

MEMORANDUM

DATE: November 5, 1994

TO: Dave Kellar - Civic Development-

FROM: Matt Sottong - Optima Direct, Inc.

REGARDING: MCCL - NL 201

This memorandum will serve as the spec sheet for this program. The following are the program details:

ODI Prog. Manager:	Matt Sottong	Home #:	[REDACTED]	Pager #:	202 - 336 - 2027
Backup Prog. Mang.:	Rich Telez	Home #:	[REDACTED]	Pager #:	- - -
Emergency Contacts:	Linda Bailie	Home #:	[REDACTED]	Pager #:	202 - 773 - 9663
	Kevin Potter	Home #:	[REDACTED]		
DP Contact:	Tim Grady	Work #:	[REDACTED]		

GOALS: Contacts: 61,659 Contacts/hr: 70 File Penetration %: 70
 (A contact is defined as delivering any part of the script to any adult or answering machine, whether the call is positive, refused or the respondent hang up - defined as a early hang-up).

CEILINGS: 61,659 Min. 70% - Max. as high as possible
 (Do not exceed the above figure. You will not be paid for any contacts above this ceiling unless authorized in writing by ODI program manager).

DATE/# RECORDS TO VENDOR: 88,059 11/05/94

PROGRAM START: 11/05/94 PROGRAM END: 11/07/94
 (These are firm dates - you must adhere to them, unless notified otherwise)

PHONING PATTERN: 9 AM - 9 PM Mon-Sat/12 PM - 9 PM Sun (EST time zone)

REPORTING: Use attached format/layout exactly as is. (Reports should match all of the data that is transmitted to us - you will only be paid on correct transmitted data, not reported contacts). Reports should be sent each day to my attention no later than 9:00 am EST.

FLASH COUNTS: You will need to provide flash counts throughout the program. See attached form.

SCRIPTS: Use attached (scripts must be read verbatim).

COSTS: Payment is as follows:

040

~~\$32/Contact~~. A contact is defined as delivering any part of the script to any adult or answering machine, whether the call is positive, refused or the respondent hang up early). We will not pay for Bad Numbers, Telcos or Deceased records. Your invoice should reflect all of the contact data that has been transmitted to us. Remember you only be paid on correct transmitted data, not reported contacts. Send your invoice to my attention on 11/09/94.

RECORDS TO ODI: 11/11/94

11/11/94

MONITORING:

We will be scheduling monitor sessions with you throughout the course of this program. For each monitoring session you need to have the following information available: Hours phoned, number of contacts/hr, completes/hr, and any constituent feedback.

MISC:

Please fill out the following information, sign & fax back to my attention ASAP. This will serve as the contract for this program unless you are notified of any changes, verbally & followed in writing by ODI program manager.

Vendor Acct Mang:

Work #:

Fax #:

Home Phone #:

Backup Acct Mang:

Work #:

Fax #:

Home Phone #:

Emergency Contact:

Work #:

Fax #:

Home Phone #:

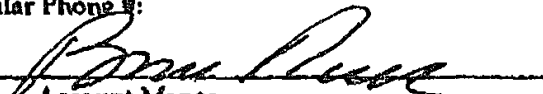
DP Contact:

Work #:

Fax #:

Home Phone #:

Cellular Phone #:


Account Manager -

11/6/94
11/1/94

1000 Vermont Avenue NW Washington, DC 20005-4903 Telephone 202 842 2400 Telecopier 202 842 0992

20 04 397 311
TIME 23:40:02

MCCL

MINNESOTA CITIZENS CONCERNED FOR LIFE
A PRO-LIFE MOVEMENT

4249 Nicollet Avenue/Minneapolis, MN 55409/Ph.(612) 825-6831

11-01-94
Matt Sottong
Optima Direct
1000 Vermont Ave NW
Washington, D.C. 20005-4903

Enclosed please find 1 disk containing 466 records for Get-Out-The-Vote for some additional names in 19B. They should be merged with the previous 19B and given the script for Grams/Klinzing.

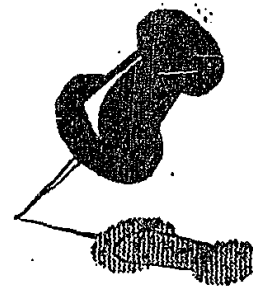
As before, the files are in ASCII, fixed length format. If the phone field has 'NO CALLS' we have used that merely for no calls for fundraising. These people then have their phone number in the comment field, or if the comment field contains the township name, then the phone number is in the spouse field. This disk contains only 19B records, and they were put onto the disk using BACKUP, so you'll need to use RESTORE to get them loaded. See the enclosed file layout for field beginnings and lengths.

Should you have any questions (or suggestions), you can call me at 612-825-6831. Please return the disks when you have finished with them. Thank you.

Sincerely,



Mary Ann Sexton



FAX COVER PAGE

To: BRIAN	From: MIATT SOHONG, RICH TELIEZ
Company: CIVIC DEVELOPMENT	Company: Optima Direct, Inc.
Fax Number: 1 908 634 6530	Total Pages Including Cover: 3
Date: 11/5/94	Time: 12:50
For Information Call: 202-842-2400	
Subject: LAYOUT SHEETS FOR NL201	Fax Number: 202-842-0992

This facsimile contains PRIVILEGED & CONFIDENTIAL information, intended only for the use of the addressee(s). If you are not the intended recipient, you are hereby notified that any dissemination or copying of this facsimile is strictly prohibited. If you have received this facsimile in error, please notify us by phone immediately and return the original facsimile to us at 1000 Vermont Avenue, NW, Washington, DC, 20005.